



MEMO ENDORSED

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May 7, 2021

SO ORDERED:

The parties shall submit another joint status letter by June 4, 2021. The Clerk of Court is respectfully directed to lift the STAY of this case.

Ona T. Wang

5/11/21

United States Magistrate Judge

VIA ECF

The Honorable Ona T. Wang
United States Magistrate Judge
United States District Court
The Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Mitchell v. Salvatore & Co. LLC, *et al.*
Case No. 1:20-cv-8527 (PAE)(OTW)

Dear Magistrate Judge Wang:

We represent Defendants Salvatore & Co., L.L.C. and Michael Salvatore (“Defendants”), in the above-referenced action. Pursuant to the Court’s April 29, 2021 Order, we submit this joint status letter, along with Plaintiff’s counsel, to inform the Court of the parties’ plan for completing discovery by June 18, 2021.

The parties plan to complete all fact discovery by June 18, 2021. Due to the nature of the claims, the parties do not plan to conduct expert discovery. Responses to document demands and interrogatories will have been completed by Defendants by May 14, 2021. Thereafter, the parties have approximately one month to complete all depositions.

In the meantime, counsel for the parties continue to discuss a resolution. There were two telephone calls held between the undersigned and Plaintiff’s counsel this week to talk settlement. Defendants reserve their right to seek Your Honor’s assistance in the form of a settlement conference to bring this matter to resolution.

The Honorable Ona T. Wang
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We thank the Court for its consideration.

Respectfully submitted,

/s/ *Eric Su*
Eric Su

cc: Douglas B. Lipsky, Esq.
Ira M. Saxe, Esq.